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May 6, 2013

VIA ECF & United States Mail

The Honorable Dora L. Irizarry
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: The United States of America against John Cekaj, et. al. CR-11-486

I provide you with this request seeking your consent to permit John Cekaj, scheduled to be sentenced on May 13, 2013, to attend the First Communion of his youngest son, John Jr. on Saturday, May 11, 2013. The ceremony will be held at their parish, St. Columbanus Church, located at 122 Oregon Road, Cortland Manor, NY. The ceremony begins at 10am.

Following the ceremony, the Cekaj family is hosting a luncheon at Enzo's Restaurant, located at 1998 Williamsbridge Road, Bronx, NY. The reason they are celebrating the First Communion in the Bronx is because most of Mr. Cekaj's immediate family reside in the Bronx and they do not drive. It is also easier for the immediate family of his wife, Jamie, as the majority of her immediate family reside on Long Island.

Mr. Cekaj needs to be at the church by 9:30am, so permission is sought for him to leave his residence at 9am. The celebration is expected to end at approximately 6 – 6:30pm, so he requests your consent to arrive home by 7:30pm.

AUSA Steven Tiscione does not have objection to this request. Pre-Trial Services does not object to this request.

As Your Honor is aware, I submitted my pre-sentence memorandum late, causing Mr. Cekaj's sentence to be adjourned from May 8, 2013 to May 13, 2013. I did discuss with A.U.S.A. Parlovecchio this request prior to the rescheduling and never presumed Your Honor would grant it and permit my client to self-surrender in the event he is sentenced to incarceration.

Words cannot express how sorry I am for my late submission. I'm embarrassed that my late submission has compromised my reputation among my esteemed colleagues and has

cast me such a poor light to Your Honor. I can take some solace from knowing that Your Honor will not let my submission affect Mr. Cekaj's sentence. I can assure Your Honor that I will never place myself in such a position if I ever have the privilege of appearing before you again.

Should you have any questions, or seek additional information, please do not hesitate to contact me. Thank you in advance for all of your courtesies.

Yours,



Kevin O'Donnell

cc: A.U.S.A. Steven Tiscione
A.U.S.A. Gina M. Parlovecchio
A.U.S.A. Una Dean
U.S. Pretrial Services Officer Anna Lee
U.S. Pretrial Services Officer Michael Ilaria
U.S. Pretrial Services Officer Leo Barrios